## REMARKS/ARGUMENTS

### 1.) Claim Amendments

The Examiner states in the Office Action Summary that claims 1-17 are pending in the application, and of those claims, claims 1-10 are withdrawn from consideration. This is not quite correct because claims 1-10 were canceled in the response filed on January 21, 2004. Therefore, the Office Action Summary should state that claims 11-17 are pending in the application.

The Applicant has amended claims 11 and 16. Claim 17 has been canceled; and claim 18 has been added. Accordingly, claims 11-16 and 18 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### 2.) Specification Objections

In paragraph 4 of the Office Action, the Examiner objected to the title for not being descriptive, and suggested an amended title. The Applicant has amended the title as suggested by the Examiner. Therefore, the withdrawal of the objection is respectfully requested.

### 3.) Claim Rejections – 35 U.S.C. § 103(a)

In paragraph 6 of the Office Action, the Examiner rejected claims 11, 14 and 16-17 under 35 U.S.C. § 103(a) as being unpatentable over Schutte, et al. (US 6,178,455) in view of Eikeland (US 5,828,837). Of these claims, claim 17 has been canceled and rewritten as new claim 18. The Applicant has amended independent claims 11 and 16 to better distinguish the claimed invention from Schutte and Eikeland. The Examiner's consideration of the amended claims is respectfully requested.

The Examiner cited Schutte, col. 22, lines 25-27 and col. 3, line 65 through col. 4, line 7 for teaching sending IP addresses between a global processor and a plurality of application processors. In these cited passages, Schutte discloses a "head end" which dynamically assigns a set of IP addresses to a "cable router or RF modem". The cable

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router or RF modem responds to requests from "hosts" for IP addresses by sending them IP addresses from the set. (Col. 3, line 65 through col. 4, line 7).

The Examiner further stated that Schutte does not teach dynamically adjusting the size of the blocks of IP-addresses to minimize the amount of traffic required to request and distribute the IP-addresses. The Examiner stated that Eikeland teaches dynamically adjusting the size of data blocks transmitted through a network according to the amount of traffic. (Col. 5, line 62 through col. 6, line 30. The Examiner then concludes that it would be obvious to a person skilled in the art to combine the teachings of Schutte and Eikeland to achieve the claimed invention. The Applicant respectfully disagrees.

The passage referred to in Eikeland merely describes well-known TCP flow control procedures, in which the size of a send-window is reduced to slow the data rate when acknowledgment data packets indicate that some packets are being lost in transmission. TCP flow control procedures have been widely known and used for many years. Yet despite this widespread and long-standing use of TCP flow control procedures, no one (until the Applicant) designed a method of distributing IP-addresses in which a global processor sends blocks of IP-addresses to application processors, and dynamically adjusts the size of the blocks to minimize traffic while satisfying the needs of the application processors. Thus, it appears that the Examiner has reached his obviousness conclusion through the impermissible use of hindsight gained from reviewing the Applicant's disclosure.

Claim 11 has been amended to recite that the global processor includes means for transferring from the global pool to a requesting application processor, a block of IP-addresses comprising a plurality of IP-addresses in response to a request for an additional IP-address from the requesting application processor. The global processor also includes means for dynamically adjusting the size of the blocks of IP-addresses transferred to the application processors to minimize the amount of traffic required for the application processors to request IP-addresses from the global processor and for the global processor to distribute IP-addresses to the application processors, while also ensuring that each application processor has a sufficient number of IP-addresses available to serve all requests for additional IP-addresses from users in each application

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processor's associated external network. Thus, the global processor transfers a larger block of IP-addresses to an application processor that receives a greater number of requests for IP-addresses from users in the application processor's associated external network.

Basis for the amendments to claim 11 is found in the originally filed specification on page 2, lines 10-13 (some application processors use IP-addresses faster than others); page 4, lines 20-30; and page 5, lines 4-7.

For all the above reasons, the withdrawal of the rejection and the allowance of amended claim 11 are respectfully requested.

Claim 14 depends from amended claim 11 and recites further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claim 14 is respectfully requested.

Independent claim 16 has been amended in a manner similar to amended claim 11, and its allowance is respectfully requested for the same reasons.

Independent claim 17 has been canceled and rewritten as new claim 18. Claim 18 is a method claim corresponding to amended claim 11. Therefore, the allowance of claim 18 is respectfully requested.

In paragraph 12 of the Office Action, the Examiner rejected claims 12-13 under 35 U.S.C. § 103(a) as being unpatentable over Schutte and Eikeland in view of Wang, et al. (US 6,496,511). The Examiner stated that Schutte and Eikeland teach the invention as claimed in base claim 11, and that Wang shows a customized function that releases an IP-address. However, as noted above, Schutte and Eikeland do not teach or suggest the invention recited in amended claim 11. The combination with Wang also fails to teach or suggest each element of amended claim 11. Claims 12-13 depend from amended claim 11 and recite further limitations in combination with the novel elements of claim 11. Therefore, the allowance of claims 12-13 is respectfully requested.

In paragraph 17 of the Office Action, the Examiner rejected claim 15 under 35 U.S.C. § 103(a) as being unpatentable over Schutte and Eikeland in view of Antic, et al. (US 5,561,854). The Examiner stated that Schutte and Eikeland teach the invention as claimed in base claim 11, and that Antic shows making backup copies of a home
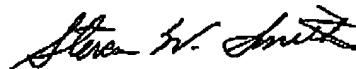
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location register on a persistent storage medium.  However, as noted above, Schutte and Eikeland do not teach or suggest the invention recited in amended claim 11.  The combination with Antic also fails to teach or suggest each element of amended claim 11.  Claim 15 depends from amended claim 11 and recites further limitations in combination with the novel elements of claim 11.  Therefore, the allowance of claim 15 is respectfully requested.

## CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance.  The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 11-16 and 18.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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